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Formal Complaint and Demand for Investigation Regarding Probation Officer Stylianos Agapiou

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To: "anthony_merolla@miep.uscourts.gov" <anthony_merolla@miep.uscourts.gov>, kinikia_essex@mied.uscourts.gov

Dear Anthony Merolla, Kinikia Essix, and Hon. Stephen J. Murphy, III,

Formal Complaint and Demand for Investigation Regarding Probation Officer Stylianos Agapiou

I, Adrienne Rockenhaus, am writing to file a formal complaint and demand a thorough investigation into the conduct of Probation Officer Stylianos Agapiou in the case of my husband, Conrad Rockenhaus, case number 2:23-CR-20701. My husband is currently on federal supervised release following a CFAA violation. He had no issues during his time reporting to his previous probation officer, LaMisha Rice. I have been advised by the Department of Justice Inspector General to submit my complaint regarding Probation Officer Agapiou to the Court Administrator.

Since Stylianos Agapiou took over my husband's case, their conduct has been increasingly concerning and, in my opinion, constitutes serious overreach, potential violations of policy and procedure, harassment, exploitation of vulnerable individuals, professional misconduct, a clear misrepresentation of our company's legitimate business activities, a disturbing disregard for my husband's well-being and documented need for mental health support, and a deliberate attempt to manufacture a violation of my husband's supervised release. I outline the specific incidents below:

1. Unauthorized and Inconsistent Seizure of Authorized Property & Data

Breach: Probation Officer Agapiou seized a work cell phone (iPhone) that had been previously authorized by my husband's prior probation officer, LaMisha Rice. This action was taken without any apparent justification or change in circumstances. This cell phone contained access to both a HIPAA-protected system and a credit card processing system. The seizure of this device, without proper authorization or procedure, constitutes a potential data breach and a serious violation of privacy and security protocols. Furthermore, the probation officer reported this possession to the judge, creating the impression of a new violation when the device was previously approved. **It is important to note that Probation Officer Agapiou allowed my husband to retain his previously authorized iPad, demonstrating an inconsistent and seemingly arbitrary application of rules.**

2. **Harassment and Intimidation, Including Attempted Forced Entry:** During the seizure of the cell phone, Probation Officer Agapiou harassed and attempted to intimidate me by falsely claiming they had the authority to search all of my corporate computer systems, despite the fact that these systems contain HIPAA-protected data. This statement was clearly intended to cause distress and fear, as such a search would be a gross violation of privacy regulations and likely beyond their legal purview. **Furthermore, I have video evidence of Probation Officer Agapiou attempting to force open our door when he knew we weren't home. He referenced this incident while attempting to intimidate me, demonstrating a willingness to use his knowledge of this unauthorized entry as leverage.**

3. **Threat of Unlawful Search and Seizure:** While I was recovering from a head injury, Probation Officer Agapiou called me and threatened to raid our home and search not only

my husband's belongings but also my personal belongings. This threat was made without any legal justification and constitutes harassment. This interaction, along with the previous incident, was captured by our indoor security camera system.

4. **Inappropriate Blame and Attempt to Control My Behavior:** Following the harassment directed at me, Probation Officer Agapiou then told my husband that the situation was his fault and that he needed to "control me better." This statement is not only inappropriate but also reveals a disturbing lack of professionalism and a complete disregard for proper boundaries.
5. **Exploitation of My Disability and My Husband's Vulnerability:** Probation Officer Agapiou is aware that I have a disability and that my husband is my primary caregiver. They are exploiting this knowledge as an intimidation tactic, attempting to scare me into acquiescing to their unlawful and unethical behavior by threatening the stability of my care. Furthermore, my husband has a history of a severe traumatic brain injury, resulting in seizures and making it difficult for him to process and respond to stressful situations. This vulnerability is also being exploited by the probation officer.
6. **Disregard for Documented Medical Crisis, Inpatient Treatment, and Urgent Need for Mental Health Support:** My husband experienced a severe medical crisis requiring ambulance transport to the hospital. He was subsequently discharged into an outpatient psychiatric program and then admitted to inpatient psychiatric care at [REDACTED] a Veteran Affairs facility. Probation Officer Agapiou is fully aware of this sequence of events. We have a copy of the text message sent to the probation officer documenting this, and the probation officer acknowledged receipt of the message. Critically, during his last reporting date, my husband explicitly requested assistance from Probation Officer Agapiou in getting mental health help, communicating his desperate need for support. This request was disregarded by Probation Officer Agapiou, contributing to my husband's continued deterioration until he required emergency intervention. Despite this documented knowledge and my husband's direct plea for help, Probation Officer Agapiou is attempting to compel him to report while he is in treatment, which is clearly inappropriate, potentially detrimental to his health, and demonstrates a shocking disregard for his well-being.
7. **Harassment of Clients and Damage to Business Reputation:** Probation Officer Agapiou has contacted clients of our company, Cannabytes, LLC, disclosing my husband's employment status and falsely implying that their business activities are of interest to federal law enforcement. We have sworn statements from our clients detailing this harassment. This not only constitutes interference with our business and reputation but also demonstrates a lack of professional judgment.
8. **Unprofessional and Disparaging Remarks Regarding Business & Misrepresentation of Industry:** We have a recording of Probation Officer Agapiou stating to my husband that, due to their self-proclaimed "expertise" in computers, they believe our company, Cannabytes, LLC, doesn't do anything of value. This unprofessional and disparaging remark reveals a clear bias and potentially motivates their inappropriate actions towards my husband and our business. Cannabytes, LLC provides medical software and marketing for the legal medical cannabis industry in Michigan, as well as providing "seed to product" tracking systems. This is a legitimate and regulated industry in Michigan. While my husband's previous PO, LaMisha Rice, was aware of our company's work adjacent to the cannabis industry and understood that we do not handle cannabis ourselves, Probation Officer Agapiou has seized upon this association as a means to control and intimidate me and my husband, misrepresenting the nature of our business and implying wrongdoing where none exists.
9. **Creation of a Hostile and Intimidating Environment & Threats of Violation Based on Personal Bias:** Probation Officer Agapiou's attempts to intimidate and control me have created a hostile and frightening environment. His communication style and tactics are deeply unsettling and have caused me significant emotional distress. I am increasingly fearful of interactions with Probation Officer Agapiou due to the way he speaks to me. Furthermore, Probation Officer Agapiou has repeatedly stated to both my husband and myself that he is intent on "tallying" what he perceives as violations and has explicitly stated

that he will violate my husband, asserting that his word will be given more weight by the judge than mine because I am "married to a felon hacker." This statement demonstrates a clear personal bias and a disturbing intent to abuse his position of authority.

10. **Deliberate Attempt to Manufacture a Violation and Failure to Communicate:** Probation Officer Agapiou has made no attempts to contact me regarding my husband's required reporting, despite having my contact information and a history of communicating with me. I only learned of his attempt to compel my husband to report on February 14, 2025, at 10:00 AM because I found a card left at our door this morning. This is particularly concerning given that Probation Officer Agapiou is fully aware of my husband's hospitalization and my communication with him about my husband's health crisis. He even came to our house looking for my husband, despite knowing he was in the hospital. This demonstrates a deliberate attempt to manufacture a violation of my husband's supervised release by failing to properly notify him and by attempting to compel him to report while he is receiving inpatient psychiatric care. Furthermore, his failure to contact me, coupled with his previous attempts to intimidate me and his stated bias against me, makes me fear that he is intentionally avoiding communication and attempting to use this situation to further harass and control me. I am fearful of his attempts to come to our home when I am alone, particularly given that I have video evidence of him previously attempting to break into our house.

These actions by Probation Officer Agapiou demonstrate a pattern of harassment, intimidation, overstepping of authority, potential legal violations, the unethical exploitation of vulnerable individuals, professional misconduct, a clear misrepresentation of our company's legitimate business activities, a disturbing disregard for my husband's documented need for mental health support, and a deliberate attempt to manufacture a violation of my husband's supervised release. They have caused significant distress to my husband and our family, jeopardized our business, potentially compromised sensitive data, directly targeted my well-being and my husband's health, particularly in light of his documented medical and psychiatric crisis, and damaged our company's reputation within a specific and regulated industry.

I demand a full and impartial investigation into these allegations against Probation Officer Stylianos Agapiou. I am available to provide further details and evidence, including the security camera footage, the text message documentation, sworn statements from our clients, the recording of the probation officer's disparaging remarks, documentation of my husband's request for mental health assistance, and the card left at our door, to support my complaint.

Thank you for your attention to this serious matter.

Sincerely,

Adrienne Rockenhaus

[REDACTED]

[REDACTED]